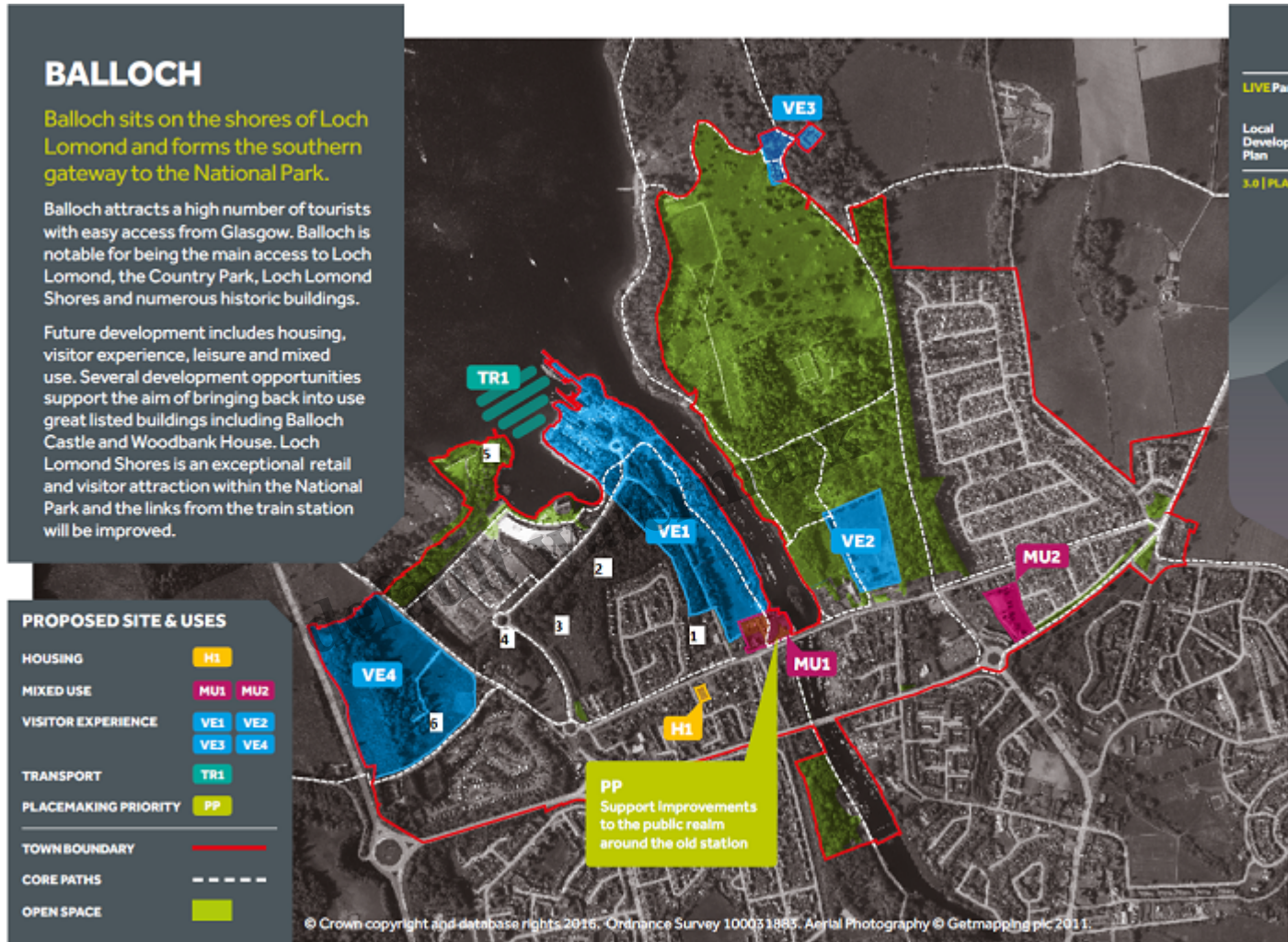


More reasons to object to the Flamingo Land Planning Application

Description



The blue shows the area identified for “Visitor Experience” in the National Park’s Local Development Plan. The numbers mark elements of the Planning Application which are contrary to the LDP. 1 = part of proposed new woodland parking area 2 = Drumkinnon Woods 3 = entrance hub 4 = service area 5 = boathouse (previously “luxury hideaway” 6 = housing on land designated for Visitor Experience

The 28 day statutory minimum consultation period on the revised Flamingo Land Planning Consultation ends on Monday when Green MSP, Ross Greer, is due to hand in over 52,000 objections he has helped gather to the Loch Lomond and Trossachs National Park Authority. The LLTNPA, to its credit, has said that it will continue to accept objections after this date although its unclear whether they will alert the public to the final closing date for objections. Its safer therefore, if you have concerns, to lodge them sooner rather than later.

Parkswatch has, over the last six months, described why the development is, in planning terms, wrong

in principle ([see here](#)) and ([here](#)). Recent submissions on the Park's Planning portal ([see here](#)), mostly from locally residents, have offered more detailed critiques of specific issues. These add considerably to the overall case against the development. This post takes a look at what they say in the hope that this will inspire more people to lodge detailed objections.

Impact of the proposed staff service area and entrance hub



View south down Ben Lomond Way from the roundabout, the proposed service area will be on the right side of the road. The entrance to what is currently the overflow car park which, it is proposed, will provide parking for the Village Lodges in Drumkinnon Woods and access to the entrance hub is visible on the left by the signs.

Local resident Geoffrey Hull has submitted a detailed critique of the service proposed area which will be located in woodland off Ben Lomond Way. His objection is well worth reading (its got maps and diagrams and is too big to upload directly but you can get it from the Park Planning portal). He is

concerned about the impact the service area will have on woodland, on bats and on traffic – when combined with the entrance hub to Flamingo Land which will be located off the car park opposite. He has undertaken a detailed examination of Flamingo Land's bat survey and traffic projections (see more on this below) and shown these are totally inadequate.



Extract from google maps showing street names and location of main places referred to in this post

Geoffrey's objection made me realise that there appear to be no descriptions anywhere in the Design Statement about the proposed Service Area apart from that it will be c900 square metres in size. Nor are there any details provided of the proposed Entrance Hub apart from that it will be c2000 square metres. Nothing about the height, proposed design or what each building will be actually be used for (site laundry for the service area?). In addition, for the Service Area there appears to be no indication of what parking is proposed.

What's more, this proposed service building lies in an area of land which has NOT been earmarked for development in the Local Development Plan and the Planning Application provides no justification for developing it. Its unclear to me if the Entrance Hub building is to be built on the car park or in the woodland but no consideration is given to whether both buildings, if they are needed, might not be better located elsewhere? In the overflow car park for example rather than in woodland.

Adequacy of Wildlife surveys

Geoffrey also provides a clinical dissection of the bat survey submitted by Flamingo Land. As I said, its worth reading in its entirety, but here is part of his conclusion:

- In summary the conclusions from attachments 1 & 2 were
- Bat recorders have a range of 5-10m, NOT 100m
 - EnviroCentre and therefore cannot include Area 10
 - Areas 10 and the Woodbank House site have no bat survey despite bat surveys being requested.
 - Mature trees in Area 10 and the Woodbank House contain bat roosts
 - The Woodbank House site does NOT contain live bats
 - The site should be subject to a thorough bat survey before development
 - All the features to support a bat population are present in Area 10 and the Woodbank House site, and therefore the possibility of disturbance to commuting and foraging
 - All inspections in Area 10 were taken from ground level therefore a full visual inspection could not be completed due to leaf cover.

Attachments 1 and 2 refer to detailed evidence submitted by Geoffrey

From the evidence Geoffrey presents, I have little doubt this is true: the bat survey presented by Flamingo Land appears totally unreliable. That is important because, in development terms, bats are protected species and full surveys are legally required before a development can go ahead. The wider implications, however, are very worrying. Can the LLTNPA or the public rely on ANY of the wildlife survey information submitted by Flamingo Land in support of their application? Can the LLTNPA really conclude that the whole site is of little consequence in terms of conservation on the basis of the surveys submitted?

Capacity of existing Scottish Water infrastructure

Another local resident, Kenneth Gibson, has provided detailed comments ([see here for full document](#)) on the adequacy of the water supply and sewerage relating to the proposed development at Woodbank House:

Due to sewage problems and flooding, the residents in Old Luss Road were provided with the results of a comprehensive and thorough survey on the sewage and drainage systems in Old Luss Road and the surrounding area in 2017/18 which was carried out by Scottish Water (SW).

This resulted in the identification of blockages due to tree roots in the system, which are now subject to an annual inspection and repair, but should be replaced or lined at some stage to prevent the tree root ingress.

It was also identified that the ageing system in Old Luss Road was not in a good state of repair and was at the limit of its capacity.

A consequence of these issues was that SW fitted non-return valves to properties 12 & 14 Old Luss Road to prevent sewage backflow and flooding to the properties.

The limit of its capacity in this area was due to additional sewage discharge of new local developments (from 6 dwelling houses to 14), Queen of the Loch hotel, Lomond Woods caravan park, Cameron House lodges, Princess Rose restaurant and McDonald's restaurant.

Flooding also occurred in this area due to road drainage issues which West Dunbartonshire Council have unsuccessfully attempted to correct due to lack of inspection and a corrective maintenance plan.

When the original Woodbank House development by Flamingo Land (FL) was announced we sent SW an email regarding our concerns over the sewage infrastructure and the resultant discharge from that development into the Old Luss Road system. The original development was for a total of 48 properties. A revised application has been presented by FL. The development now consists of 71 properties (a considerable increase), consisting of 6 dwelling houses, 15 flats and 50 lodges.

We are now even more concerned due to the vast increase in the number of properties being developed and the impact they will have on the existing sewage and drainage systems.

Flamingo Land's Design and Access statement has a section on development constraints and under the heading "utilities" has this to say about water:














"a water main cuts across the south west corner of the Woodbank site".

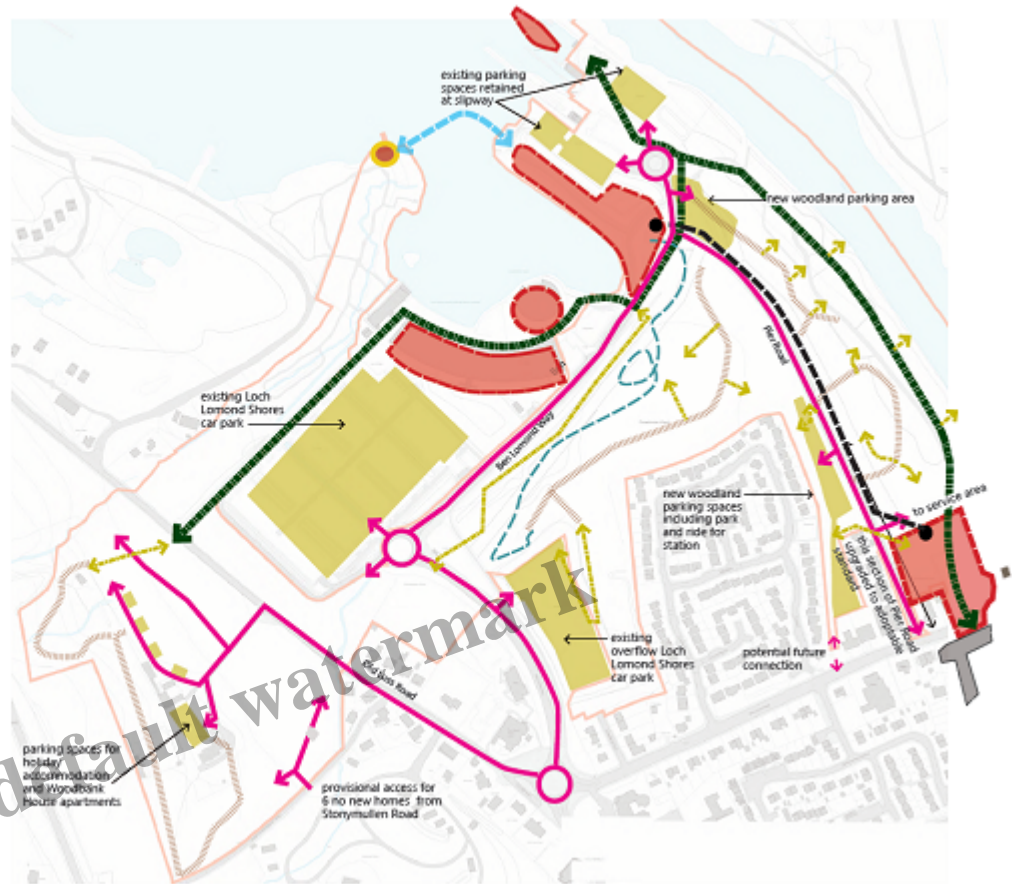
Scottish Water, in their response to the application dated 30th April state the applicant needs to provide both a water and a drainage impact assessment. This is to enable them to decide whether they can provide sufficient water to the development (existing capacity is likely to be sufficient) and then carry away and treat the waste water (not known). Flamingo Land appear not to have provided this as yet. As Kenneth explains, the significant increase in the size of the proposed development at Woodbank House and the creaking existing capacity could make the whole development unviable.

The bigger issue, of course, is the capacity of the existing infrastructure to drain and then treat waste water from the site as a whole. Its amazing that the LLTNPA, which has a statutory duty to promote "sustainable development", has not yet apparently required Flamingo Land to provide information on this, signed off by Scottish Water, BEFORE considering whether to grant Planning Permission in Principle.

Impact of additional traffic and parking

MOVEMENT AND PARKING

-  main pedestrian route incorporating Riverside Walkway (John Muir Way and route to Maid of the Loch)
-  pedestrian/cycle path suitable for emergency vehicles and route for buggy deliveries
-  tertiary small footpath - pedestrian route only
-  boathouse
-  boat access only
-  monorail between Station Square and Pierhead
-  monorail station
-  visitor destination
-  high level trestle walkway
-  sustains public realm improvement area
-  vehicular access
-  pedestrian/cycle path suitable for emergency vehicles and route for buggy deliveries
-  parking



GILLESPIES anderson bell + christie

WEST RIVERSIDE AND WOODBANK DESIGN STATEMENT 63

Map from design statement showing existing and new proposed parking areas in olive green. The lowest section of the new woodland parking on right of diagram is outwith the area earmarked for any development in the Local Development Plan. Whether there will be any parking for staff or delivery vans at the new service area – just south of roundabout in centre – is unclear.

On Sunday 28th April we had the kilt Walk at Balloch the overflow car park. Old Luss road was full, Balloch information centre was full, the Co-op car park was was full.

At 18.15 traffic was at a standstill trying to exit Balloch was inadequate for the volume of traffic involved, a present.

(Extract from comments from Henry Savage)

The Application indicates that the number of additional parking spaces Flamingo Land is proposing to create is “up to 350”, which is quite vague but a significant addition to existing capacity. It will destroy yet more woodland and part of at least one car park (1 on top map, lower right map above) is outwith any land earmarked for development. How much parking there may be in the staff service area is not indicated.

Other local residents have raised a number of very important questions about the proposal to bring more cars to Balloch, including the quality of the traffic surveys, the impact on congestion on Ben Lomond Way (the entrance to Lomond Shores AND the new resort), the knock on effect of gridlock on the A82 (queues are already miles long on holiday weekends), how the size of the proposed lodges relates to the number of parking places, the impact on pedestrian routes, increased air pollution etc. In contrast to Highland Council, which provided very critical commentary on the traffic impact assessment produced by Natural Retreats for the new Ptarmigan restaurant, West Dunbartonshire Council has been almost totally silent. One wonders why when the adverse consequences of attracting yet more traffic to a village that already can't cope is so obvious.

Impacts of the proposed access to the new luxury housing on the Woodbank House site

A couple of local residents have critiqued the proposals to route access to the euphemistically described “low density housing” on land earmarked for “Visitor Experience”. This is being proposed as an “enabling development” along the southern edge of the Woodbank House site from the Stoneymollan Rd.

2. The proposal to use Lower Stoneymollan Road as the main access to the 6 houses would be a real safety hazard and an accident waiting to happen. There is no good reason why the current road should not be used if this proposal is granted.

- a. This is a single track road.
- b. There is no pavement and the road is in a state of disrepair.
- c. It is the main pedestrian access for buses to Oban and the North.
- d. It is part of the John Muir way and is used daily by hikers, cyclists, children on their bikes and young families out walking.
- e. It is also used by many dog walkers and some horse riders.
- f. The road drains into the burn and culvert is often blocked.
- g. The road is often flooded in the winter.
- h. Any additional drainage into the burn such as gutter draining from the houses would exacerbate an already problematic area.
- i. The increase in traffic not only by residents of the houses but also visitors, deliveries, tradesmen etc would make ingress and egress from our property a real and valid safety issue.

Flamingo Land's map showing movement and parking (above) describes access to the new housing (pink arrows bottom left) as "provisional". Strangely, this map shows the John Muir Way (thick green line) as ending on the Old Luss Rd. In fact the John Muir Way turns south down Old Luss Rd and then carries on up the single track Lower Stoneymollan Rd. Hence some of the concern from local residents.

Impact on cultural heritage

The whole of the West Riverside site has a very interesting history. It is gratifying therefore to read that the West of Scotland Archaeological Service has not just commented on the application ([see here](#)) but repeated its advice that a full survey be conducted BEFORE any development goes ahead:

The application site lies within an area of high archaeological potential due to the presence of recorded sites and finds from various periods including both prehistoric and Medieval sites. The site is considered suitable for past human use and so buried remains have been identified on greenfield ground that will be disturbed by this development. There is a high potential for unearthing buried unrecorded remains which could be of archaeological interest below ground level. There is no reason to suppose that the archaeological remains in the surrounding landscape represents the full sum of archaeological remains from many thousands of years covered by our understanding of the site.

Government policy as set out in Scottish Planning Policy 2019 requires that prospective developers arrange for any archaeological remains to be adequately addressed. Since there is a high potential for unearthing buried unrecorded remains at this location I advise that the application area be subject to a pre-construction archaeological excavation out by professional archaeologists retained by the developer. In this way any remains discovered can be recorded and published before they are destroyed by the construction. Recording and evaluation will also be required as a condition of any alterations taking place.

In order to effect this a condition relating to the archaeological remains to be included in the consent granted by your Council for these or future proposals. A condition is given below. This is based on current best practice and the principles outlined in Planning Advice Note 2/2011.

Flamingo Land's Environmental Statement took a very narrow view of the cultural worth of the site. It limited its assessment to the historic buildings and Woodbank House and the Pierhead area, rather than considering the history of land-use on the site as a whole. That would have highlighted the need for thorough archaeological investigations.

The wider issue that this highlights is that Flamingo Land has included NOTHING in its application for Planning Permission in Principle that would celebrate or commemorate the cultural heritage of the area. To me, the one development which might fulfil the statutory aims of the National Park in the Pierhead area, is a museum or other type of interpretative facility – designed to enhance the setting of the steam slipway and Maid of the Loch. This could display artefacts recovered from the site, including during any construction works, and interpret how the multiple uses people have made of this land over the last few centuries relates to the natural history of the loch.

Unfortunately the LLTNPA has in the last few years been very weak on promoting the cultural heritage of the National Park. It did nothing, for example, to enable the local community in Strathfillan to realise their aspiration of a mining museum at Tyndrum when it gave the go ahead to the Cononish goldmine. It has also failed to make the most of its founding aspirations and steadily closed its Visitor Centres, including the one at Loch Lomond shores. The WOSAS response is a reminder that unless more people press for the LLTNPA to make interpretation of the cultural heritage integral to the gateway to Loch Lomond, this is unlikely to happen.

What needs to happen

What these submissions show is that the more Flamingo Land's proposals are subject to detailed scrutiny, the less they stand up. The LLTNPA is far too close to Flamingo Land, having sat on the interview panel which appointed them as preferred developer, and has allowed them to submit a revised Planning Application which is far below what we should expect in a National Park. The evidence presented in this post suggests that before LLTNPA staff present the Planning Application for decision they need to:

- Require Flamingo Land to submit more details about the design and purpose of the Entrance Hub and Service Area on either side of Ben Lomond Way
- Require Flamingo Land to produce specific justifications for all the land where development is proposed which lies outwith land earmarked for development in the Local Development Plan
- Ask West Dunbartonshire Council to take a far more critical look at the likely increase in traffic which will result from the proposed development
- Require Flamingo Land to address inconsistencies in information presented in different parts of the Application so its clear what is actually being proposed (the inclusion/omission of the John Muir Way from different maps being just one example)
- Require a proper assessment of the impact of the development on water and sewerage systems
- Require Flamingo Land to provide an assessment of all access options to the proposed new housing on Stonymollan Rd to ascertain if the issues raised by objectors could be addressed
- Subject all wildlife surveys submitted by Flamingo Land to independent scrutiny
- Ask Flamingo Land to extend its consideration of the impact of the development on the cultural heritage of the area to the whole site and not just the historic buildings

It will be interesting to see whether, in the light of recent objections, the LLTNPA try to rush the

Flamingo Planning Application through or whether they require the developer to supply more information such as suggested here.

Category

1. Loch Lomond and Trossachs

Tags

1. Development Plan
2. flamingo land
3. LLTNPA
4. planning
5. public transport

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